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September 25, 2024

BY ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Reclaim the Records, et al. v. United States Citizenship and Immigration Services*, No. 23 Civ. 1997 (PAE)

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act. I write to respectfully request a final 7-day extension of the deadline for Plaintiffs' response to Defendant's motion to dismiss, for summary judgment, or for severance.

Plaintiffs have made one previous extension request on September 9, granted the same day. We respectfully request this additional time to permit completion of a Declaration by one of the plaintiffs, which will assist the Court in understanding the claims but which will require slightly more time than expected to complete. Counsel for the Defendant has consented to this request, and to the proposed revised schedule below:

	Current due date	Proposed revised date
Plaintiffs' response to Defendant's motion	September 27, 2024	October 4, 2024
Defendant's reply	November 1, 2024	November 8, 2024
Plaintiffs' reply on cross-motion	November 22, 2024	November 27, 2024

This is the second request by Plaintiffs for an extension of the briefing schedule. Prior to the present motion and during efforts to narrow or resolve the issues in the case, the Court granted eleven extensions of Defendant's time to answer (ECF Nos. 9, 12, 14, 16, 18, 20, 22, 26, 29, 31 and 33).

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I thank the court for its consideration of this request.

Respectfully submitted,

/s/ Benjamin Meyers
Benjamin Meyers

cc: Defendant's counsel (by ECF)